

Hearing Date and Time: To be determined.  
Response Deadline: October 25, 2019  
Reply Deadline: November 15, 2019

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L. DE C.V.,  
*et al.*

Debtors in a Foreign Proceeding.

GONZALO GIL-WHITE, PERSONALLY AND IN  
HIS CAPACITY AS FOREIGN REPRESENTATIVE  
of PERFORADORA ORO NEGRO, S. DE R.L. DE  
C.V. AND INTEGRADORA DE SERVICIOS  
PETROLEROS ORO NEGRO, S.A.P.I. DE C.V.

Plaintiff,

-against-

ALP ERCIL; ALTERNA CAPITAL PARTNERS,  
LLC; AMA CAPITAL PARTNERS, LLC; ANDRES  
CONSTANTIN ANTONIUS-GONZÁLEZ; ASIA  
RESEARCH AND CAPITAL MANAGEMENT LTD.;  
CQS (UK) LLP; FINTECH ADVISORY, INC.;  
DEUTSCHE BANK MEXICO, S.A., INSTITUCIÓN  
DE BANCA MÚLTIPLE; GARCÍA GONZÁLEZ Y  
BARRADAS ABOGADOS, S.C.; GHIL  
INVESTMENTS (EUROPE) LTD.; JOHN  
FREDRIKSEN; KRISTAN BODDEN; MARITIME  
FINANCE COMPANY LTD.; NOEL BLAIR  
HUNTER COCHRANE, JR; ORO NEGRO PRIMUS

Chapter 15

Case No. 18-11094 (SCC) (Jointly  
Administered)

Adv. Pro. No. 19-1294(SCC)

PTE., LTD.; ORO NEGRO LAURUS PTE., LTD.;  
ORO NEGRO FORTIUS PTE., LTD.; ORO NEGRO  
DECUS PTE., LTD.; ORO NEGRO IMPETUS PTE.,  
LTD.; PAUL MATISON LEAND, JR.; ROGER  
ALAN BARTLETT; ROGER ARNOLD HANCOCK;  
SEADRILL LIMITED; SHIP FINANCE  
INTERNATIONAL LTD.; and DOES 1-100

Defendants.

**NOTICE AND MOTION TO DISMISS COMPLAINT**  
**FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE THAT, upon the accompanying Foreign Defendants' Memorandum of Law in Support of Their Motion to Dismiss for Lack of Personal Jurisdiction, and all pleadings and proceedings heretofore had before this Court, Defendants Asia Research and Capital Management Ltd., Alp Ercil, CQS (UK) Ltd., GHIL Investments (Europe) Ltd., and Ship Finance International Ltd., (collectively, the "Foreign Defendants"), by its undersigned counsel, will move before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 623 of the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York, 10004, at a date and time to be determined by the Court, pursuant to Federal Rules of Civil Procedure 12(b)(2), for the entry of an Order (i) dismissing the Complaint in its entirety as against the Foreign Defendants, and (ii) granting such other and further relief as this Court may deem just and proper. (Hereinafter, the "Motion.")

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be in writing, must conform to the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and the Local Rules of the Bankruptcy Court for the Southern District of New York, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefore, and must be filed with the Bankruptcy Court, by no later than **October 25, 2019**, and any objection must further be served upon (i) Paul, Weiss, Rifkind, Wharton & Garrison LLP,

1285 Avenue of the Americas, New York, New York 10019, Attn: Andrew N. Rosenberg, Esq., Aidan Synnott, Esq., William A. Clareman, Esq., and Claudia Tobler, Esq., attorneys for Ad Hoc Defendants; (ii) Quinn Emanuel Urquhart & Sullivan, LLP, 1300 I Street NW, Washington, D.C., Attn: Juan P. Morillo, Esq., attorney for Plaintiffs; and (iii) those parties who have filed a notice of appearance in the above referenced adversary proceeding.

PLEASE TAKE FURTHER NOTICE, that a hearing will be held with respect to the Motion on a date and at a time to be determined by the Court.

Dated: August 26, 2019  
New York, New York

PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP

/s/ William A. Clareman

Andrew N. Rosenberg  
Aidan Synnott  
William A. Clareman  
Claudia Tobler  
Daniel A. Crane  
Christopher Hopkins  
Crystal Johnson

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